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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

This document relates to:

All actions

Master File No. 5:22-cv-07557-PCP

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY DAUBERT
MOTION BRIEFING DEADLINES**

[L.R. 6-2]

The parties jointly ask the Court for an extension of the deadlines for the parties' pending and forthcoming Daubert motions related to Plaintiffs' motion for class certification (the "Class Motion"). The parties make this request because, while they previously sought from the Court and obtained a modified schedule for the parties' briefing of the Class Motion, *see* ECF No. 195 ("Scheduling Order"), in doing so they did not clarify that any Daubert motions in support of or in opposition to the Class Motion, and any opposition or reply briefs, should proceed in parallel with the briefing. As the current Scheduling Order does not reflect this, pursuant to Civil L.R. 7-3 Plaintiffs' oppositions to Meta's Daubert motions filed October 27, 2025, *see* ECF Nos. 230, 233, are due within 14 days, and Meta's subsequent reply briefs are due within seven days.

Counsel have met and conferred and have agreed, subject to approval by the Court, to alter the deadlines for responding to all Daubert motions in support of, or in opposition to, the Class Motion to align with other briefing deadlines:

Event	Current Deadline	Proposed New Deadline
Plaintiffs' Oppositions to Meta's Motions to Exclude Plaintiffs' Class Motion Experts	November 10, 2025	December 15, 2025 (current deadline for Plaintiffs' Reply in Support of Class Motion)
Meta's Replies in Support of its Motions to Exclude Plaintiffs' Class Motion Experts	November 17, 2025	January 14, 2026
Plaintiffs' Motions to Exclude Meta's Class Motion Experts (if any)	December 15, 2025	(No Change)
Meta's Oppositions to Plaintiffs' Motions to Exclude Meta's Class Motion Experts (if any)	December 29, 2025	January 21, 2026
Plaintiffs' Replies in Support of their Motions to Exclude Meta's Class Motion Experts (if any)	January 5, 2026	February 13, 2026
Hearing on Class Motion	January 15, 2026 at 10:00 am	February 26, 2026 at 10:00 am

There were two prior requests to alter the class certification briefing schedule, both of which the Court granted. *See* ECF Nos. 156, 195. There is compelling good cause for this request because the parties require sufficient time to review and respond to the opposing parties' Daubert motions, and reply in support of their own Daubert Motions, which may require additional discovery.

Moreover, modifying the briefing schedule as requested by the parties aligns the briefing schedules of the Daubert motions with the Class Motion, as is typically done.

The Court has not set any deadlines other than for class certification briefing, and so granting this request will have no other effect on the schedule for the case. Accordingly, the parties jointly ask the Court to modify the current deadlines according to the new dates set forth above.

Dated: October 31, 2025

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By: /s/ Michael Liskow
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CIVIL L.R. 5-1(i)(3) ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

Dated: October 31, 2025

By: /s/ Michael Liskow
Michael Liskow

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: _____

Hon. P. Casey Pitts
U.S. District Judge